

EXHIBIT 1



KATHARINE LUCY BLADEN PEARSON

I have practised in the Cayman Islands since 2009. I regularly appear in the courts of the Cayman Islands. After many years of practice in leading litigation firms in the Cayman Islands and London, I co-founded Claritas in May 2022 in order to provide independent, conflicts free advice on Cayman Islands litigation and insolvency matters.

PROFESSIONAL EXPERIENCE

MAY 2022 TO PRESENT, PARTNER/ CO-FOUNDER, CLARITAS (CAYMAN)

My current case highlights include:

- Acting for Fortunate Drift Limited, a Chinese-owned BVI company, in a dispute with its Cayman broker-dealer regarding the dealer's retention of cash and shares in a formerly Nasdaq-listed company, Yangtze River Port and Logistics Ltd. The trial of these proceedings was heard in June 2023.
- Persuading the Court to order disclosure of beneficial ownership information relating to two Cayman companies, pursuant to the Norwich Pharmacal jurisdiction.
- *In the Matter of TCA Global Credit Fund Ltd* – acting for EY as liquidators in a case involving difficult questions of cross-border insolvency due to the parallel appointment of a US receiver.
- Acting for external investors in a shareholder dispute relating to a Hong Kong-based tech start up.
- Advising major Chinese venture capital companies on their options in light of their dissatisfaction with the management of a tech start-up with operations in China.
- Providing expert evidence on matters of Cayman Islands law for use in litigation in New York and Hong Kong, and arbitration in PRC.

2016 TO MAY 2022, PARTNER (FORMERLY SENIOR ASSOCIATE), HARNEYS (CAYMAN)

Prior to founding Claritas I was a partner in leading offshore litigation firm, Harneys. Case highlights included:

- Applying on behalf of a minority shareholder for the appointment of provisional liquidators over Natural Dairy (NZ) Holdings Limited, a company listed on the Hong Kong Stock Exchange, and subsequently acting for PwC as provisional liquidators.
- Acting for minority investors in tech start up VeRide who had been wrongfully excluded from the Board. The matter settled following issuance of a just & equitable winding-up petition in

Cayman.

- Acting for an entrepreneur minority investor in a Warburg Pincus-backed start-up, in a dispute with Warburg Pincus over the terms of exit from the investment. By threatening a just & equitable winding-up petition, we were eventually able to negotiate an agreeable outcome for our client.
- Acting for ArcelorMittal USA LLC on an application for a Norwich Pharmacal disclosure order against Cayman companies in the Essar group. This was part of a global effort to enforce a US\$1.5 billion arbitral award and closely co-ordinated with applications for relief from the High Court in England.
- Acting for Brazilian telecommunications giant, Oi S.A. on an application for an injunction to prevent a Cayman fund from interfering in its Brazilian judicial reorganization proceedings.
- Acting for Trina Solar, JA Solar and Sina Corporation in share valuation disputes under section 238 of the Cayman Companies Act, following their de-listing from US stock exchanges.
- Acting for Global Cord Blood Corporation to defend an application for an injunction to prevent it being de-listed from a US stock exchange.
- *In the Matter of Bangkok Land (Cayman Islands) Limited* – acting for the Company in defending a winding-up Petition. I was able to negotiate the dismissal of the Petition by consent.
- I provided expert evidence on numerous occasions for use in proceedings in the US and the PRC.

2009 TO 2014, SENIOR ASSOCIATE (FORMERLY ASSOCIATE), APPLEBY (CAYMAN)

Notable cases included:

- *In re Freerider Ltd*: acting for the Dutch inventor of a self-propelling wheel in relation to a dispute with his former business partner. We successfully applied for their jointly-owned Cayman company to be wound up on the just and equitable ground. I appeared with Leading Counsel on the trial and appeal. I appeared on a number of hearings in the liquidation including sanction applications and costs matters. We were ultimately able to negotiate and implement a settlement with the liquidators involving a sale of the company's intellectual property rights to an SPV thus enabling our client to regain control of his invention.
- *In re Fortune Nest Ltd*: acting for an American businessman seeking the recovery of his investment in a Cayman company. We successfully petitioned for the company to be wound up on the just and equitable ground and subsequently advised our client in relation to issues arising in the liquidation.
- *Tempo Group & Ors v Fortuna Development Corporation & Ors*: acting for a Cayman holding company in litigation by a minority shareholder challenging his removal from the board of directors.
- *In re Opus Trinity SPC (ASC)*: acting for an investor in a Segregated Portfolio Company, and subsequently for the liquidators (KPMG).
- *BTU Power Management Company v Hayat (AHJ)*: representing a shareholder in a dispute with his former business partner involving parallel proceedings in Cayman and Massachusetts.
- A number of contentious trusts matters, including applying for interlocutory and declaratory relief.
- Providing expert evidence for use in US litigation, including in relation to minority shareholders' rights under Cayman law.
- Acting for the former directors of a Cayman fund in relation to proceedings brought by the liquidators. The proceedings were ultimately settled via mediation.

2006 TO 2009, ASSOCIATE, PETERS & PETERS (LONDON)

**2004 TO 2006, TRAINEE SOLICITOR, FRESHFIELDS BRUCKHAUS DERINGER
(LONDON)**

EDUCATION

2002-2003 Legal Practice Course, BPP Law School, London, Distinction

2001-2002 Postgraduate Diploma in Law, City University, London, Commendation

1997-2001 BA, Classics, Corpus Christi College, Oxford, First (Placed third of approximately 130 students in finals and second in second year exams, and won several university and college prizes)